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Attorneys for all Defendants except Prasad Lakireddy

IN THE UNITED STATES DISTRICT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

JANE DOE I; JANE DOE II; LAKSHMI
and JARMANTI PRATTIPATI as Parents
and Successors in Interest of CHANTI
JYOTSNA DEVI PRATTIPATTI; JANE
DOE III; JANE DOE IV; JANE DOE V;
DANE DOE VI; JANE DOE VII; JANE
DOE VIII; SREEKANTH KOLLIPARA;
and All Others Similarly Situated

Plaintiffs,

vs.

LAKIREDDY BALI REDDY, an
individual; VIJAY KUMAR
LAKIREDDY, an individual; PRASAD
LAKIREDDY, an individual;
JAYAPRAKASH REDDY LAKIREDDY,
an individual; VENKATESWARA
REDDY LAKIREDDY, an individual; and
the businesses they controlled and/or
operated, including PASAND MADRAS
CUISINE, a California corporation;
PASAND, INC., a California corporation;
LAKIREDDY INVESTMENT CO., a
California limited liability corporation; L.B.
REDDY ESTATE CO., a California limited
liability company; JAY CONSTRUCTION,
a California sole proprietorship; ACTIVE
TECH SOLUTIONS, a California
corporation; VANI COMPUTER
SOLUTIONS, a California limited liability
corporation; LAKIREDDY BALI REDDY
d/b/a REDDY REALTY CO., a California
sole proprietorship; and ROES 1 through
100, inclusive,

Defendants.

Case No. C-02-5570-WHA

**RESPONSES TO PLAINTIFF JANE DOE
I'S FIRST SET OF INTERROGATORIES
TO DEFENDANT PASAND, INC.**

1 PROPOUNDING PARTY: PLAINTIFF JANE DOE I

2 RESPONDING PARTY: PASAND, INC.

3 SET NUMBER: ONE

4 INTERROGATORY RESPONSES

5 1. State YOUR full name and the address of YOUR principal place of business.

6 **RESPONSE:** Pasand Incorporated

7 2. State all other names that YOU have used (including fictitious business names)

8 between January 1, 1982 and the present.

9 **RESPONSE:** None

10 3. State YOUR legal status (i.e. corporation, partnership, joint venture,

11 unincorporated association, etc.) and the place and date YOU were formed.

12 **RESPONSE:** Corporation, 2286 Shattuck Ave. Berkeley, Ca 94704, 3/31/1983

13 4. IDENTIFY every person and ENTITY that has an ownership interest in YOU

14 and state the size of that interest (i.e. 100 percent, 25 percent, etc.) (If there have been any
15 changes in ownership since January 1, 1990, describe each change in ownership.)

16 **RESPONSE:** Lakireddy Bali Reddy, Vijay Kumar Lakireddy, Prasad Lakireddy, Jayaprakash
17 Reddy Lakireddy. It has never been stated what each persons ownership interest is.

18 5. IDENTIFY YOUR officers and directors.

19 **RESPONSE:** None

20 6. IDENTIFY YOUR ORGANIZATIONAL DOCUMENTS.

21 **RESPONSE:** None

22 7. IDENTIFY every ENTITY in which you held, directly or indirectly, a 10 percent
23 or greater ownership interest at any time between January 1, 1990 and the present.

24 **RESPONSE:** None

25 8. Did YOU ever EMPLOY any of the PLAINTIFFS to perform work in California?

26 **RESPONSE:** No

27

28

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1 9. If YOUR answer to Interrogatory No.8 is yes, list the PLAINTIFFS whom you
2 EMPLOYED to perform work in California and provide their respective dates of
3 EMPLOYMENT.

4 **RESPONSE:** N/A

5 10. For each of the PLAINTIFFS listed in response to Interrogatory No.9,
6 IDENTIFY all DOCUMENTS that report the number of hours worked by the PLAINTIFF as
7 YOUR EMPLOYEE in California and/or the WAGES paid to PLAINTIFF for such work.

8 **RESPONSE:** N/A

9 11. For each of the PLAINTIFFS listed in response to Interrogatory No.9, state whether YOU
10 ever EMPLOYED the PLAINTIFF to perform work in California OFF THE BOOKS.

11 **RESPONSE:** N/A

12 12. For each of the PLAINTIFFS listed in response to Interrogatory No.9, provide a complete
13 itemization of all money and other things of value that were provided to the
14 PLAINTIFF (or his or her family) as full or partial compensation for the PLAINTIFF'S labor as
15 YOUR employee in California and that are not reported in the records YOU identified in response
16 to Interrogatory No.10.

17 **RESPONSE:** N/A

18 13. For each of the PLAINTIFFS listed in response to Interrogatory No. 9, provide a complete
19 listing of the hours worked by the PLAINTIFF as YOUR employee in California that are not
20 reported in the records YOU identified in response to Interrogatory No.10.

21 **RESPONSE:** N/A

22 14. IDENTIFY every person (other than the PLAINTIFFS) whom YOU EMPLOYED to
23 perform work in California at any time between January 1, 1990 and the present and provide their
24 respective dates of EMPLOYMENT.

25 **RESPONSE:** None

26 15. For each person identified in response to Interrogatory No. 14, state whether YOU ever
27 EMPLOYED the person to perform work in California OFF THE BOOKS.

28 **RESPONSE:** N/A

16. For each of the PLAINTIFFS, IDENTIFY every person and ENTITY that EMPLOYED the PLAINTIFF to perform work in California prior to January 1, 2000 and provide the dates of EMPLOYMENT.

RESPONSE:

1. DOE I often socialized at restaurant defendant Pasand Madras Cuisine, but never was employed by any defendant.
2. DOE II often socialized at restaurant defendant Pasand Madras Cuisine, but never was employed by any defendant.
3. DOE III Worked for various restaurants owned by defendants including Pasand Madras Cuisine, as well as being employed by Jay Construction from 1995 until the end of 1999.
4. DOE IV Worked for Jay Construction from 1995 until 1999. DOE IV was paid by Active Tech Solutions, but never performed any actual work for Active Tech Solutions.
5. DOE V Worked for Jay Construction from 1995 until 1999.
6. DOE VI Worked for Jay Construction from 1995 until 1999.
7. DOE VII was never employed by a defendant.
8. DOE VIII worked for Pasand Madras Cuisine from September of 1999 until January of 2000.
9. SREEKANTH KOLLIPARA came to the United States in December of 1999 to work for Active Tech Solutions, but never worked for Active Tech Solutions.
10. CHANTI JYOSTHNA DEVI PRATTIPATI often socialized at restaurant Pasand Madras Cuisine, but never was employed by any defendant.

Dated: March 17, 2003

BISHOP, BARRY, HOWE, HANEY & RYDER

By: 

MICHAEL W BOLECHOWSKI
MARK C. RASKOFF

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VERIFICATION

RESPONSES TO PLAINTIFF'S INTERROGATORIES TO PASAND, INC.

- ☐ I, Lakireddy Bali Reddy, am a party to this action; the attached document is true of my own knowledge, except as to the matters that are stated there upon my information and belief or as to matters within the knowledge of my counsel of record or their agents, and as to those matters I believe them to be true.
- ☒ I am an officer or agent of the party providing this Verification, and am authorized to make this Verification for and on its behalf, and I make this Verification for that reason; I have read the attached document(s) and know the contents; I am informed and believe and upon that ground allege that the matters stated in said document(s) are true.
- ☐ I am one of the general partners of the partnership providing this Verification, and am authorized to make this Verification for and on behalf of the partnership, and I make this Verification for that reason; I have read the attached document(s) and know the contents; I am informed and believe and upon that ground allege that the matters stated in said document(s) are true.
- ☐ I am one of the attorneys for the party required to provide this verified Answer; I make this Verification on behalf of said party who is absent from the County of Alameda, California, where I have my office; I have read the attached Answer and know its contents; I am informed and believe and on that ground allege that the matters stated in it are true.
- ☐ I am one of the attorneys for the party required to provide this verified response. I make this Verification for the reason checked below:
- ☐ because the facts alleged in the attached document are within my own personal knowledge, and are not within the knowledge of the responding party or any of its agents or employees;
- ☐ because the responding party's whereabouts are unknown to me, said party has failed to communicate with me concerning the subject litigation, and it is impossible, impractical or futile to secure said party's Verification to the attached document;

The matters stated in the attached document are true of my own knowledge, except as to any matters stated therein upon information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this Verification was executed on 3-13, 2003 at COMPAC, California.


Lakireddy Bali Reddy